

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CIVIL ACTION NO. 05-11608-GAO

DAVID COX,

Plaintiff,

v.

**RYAN MARINI, SEAN BORDWELL,
AND JOHN DOE,**

Defendants.

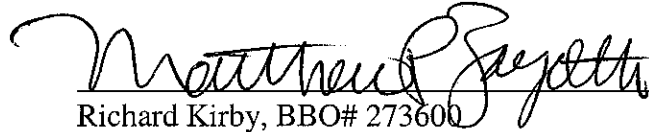
DEFENDANT RYAN MARINI'S MOTION FOR PROTECTIVE ORDER

The Defendant Ryan Marini hereby moves for a protective order that he is not required to disclose, through initial disclosures or otherwise, the name and address of Defendant John Doe. In support of this motion and for reasons more fully set forth in the attached Memorandum of Law and Affidavit of Ryan Marini filed herewith, the Defendant states that this Court must enter the requested protective order because John Doe has threatened to kill Mr. Marini and his family if Mr. Marini discloses John Doe's identity.

WHEREFORE, the Defendant Ryan Marini respectfully requests that this Honorable Court enter a protective order that Defendant Marini not be required to disclose, through initial disclosures or otherwise, the name and address of Defendant John Doe.

DEFENDANT RYAN MARINI

By his attorneys,



Richard Kirby, BBO# 273600

Matthew P. Zayotti, BBO# 638265

Keegan Werlin LLP

265 Franklin Street

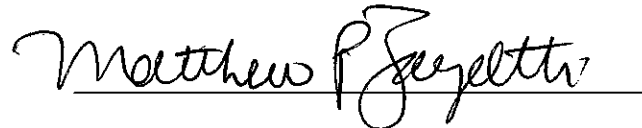
Boston, Massachusetts 02110-3113

(617) 951-1400

Dated: May 26, 2006

CERTIFICATION PURSUANT TO LOCAL RULE 7.1(A)(2)

I, Matthew P. Zayotti, hereby certify that on May 22, 2006, I conferred with Damon P. Hart, Esq., counsel for the Plaintiff David Cox, in a good faith attempt to resolve or narrow the issues related to this motion.



CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on

May 26, 2006

